

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

VOLKSWAGEN GROUP OF AMERICA, INC.,

Plaintiff,

v.

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

Civil Action No. 1:19-cv-01574-AJT-MSN

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff Volkswagen Group of America, Inc. (“Plaintiff” or “VWGoA”), by counsel, and pursuant to Fed. R. Civ. P. 55(b), hereby moves for entry of default judgment against certain named defendants. For the reasons set forth in Plaintiff’s accompanying Memorandum, Plaintiff respectfully requests that this Court enter a default judgment against the following Defendants as numbered in Schedule A:¹

No.	Defendant Name	Defendant eBay ID	PayPal email address
1	桂国 陈 (Gui Guo Chen)	2018pineapple	chenuiuo02@outlook.com
8	子雄 郑 (Zi Xiong Zheng)	autoscandiy	Money@kdscanner.com samzheng2016@126.com autotechDIY@yahoo.com
9	玉婷 胡 (Yuting Hu)	balanceboard uk	balanceboards@outlook.com
10	修珑 胡 (Hu Xiulong)	beadsmarket	shengwanglei@yahoo.com hallo_schmuck_lei@outlook.com hallo_schmuck_lei@yahoo.com homeshopping_DIY@yahoo.com

¹ Plaintiff is only seeking the entry of default against Defendants with whom Plaintiff has not reached a settlement. Plaintiff has reached a satisfactory settlement with the other named Defendants.

No.	Defendant Name	Defendant eBay ID	PayPal email address
11	似业 胡 (Shi Ye Hu)	bestobal	ylworldtrading@hotmail.com
13	岩岩 蔡 (Yan Yan Tsai)	caiyanyantiger	caiyanyan1980@hotmail.com caiyanyan1980_1@hotmail.com caiyanyan1980_2@hotmail.com
15	程 陈 (Cheng Chen)	chengcheng788	aooqhmhqq80@hotmail.com
16	晓芳 冯 (Xiaofang Feng)	cntopstore	597969631@qq.com
17	修珑 胡 (Hu Xiulong)	craftdiyonline	gemstone.beauty2009@gmail.com huangwg@yahoo.com huangwg_0702@outlook.com xiulonghu@outlook.com xiulonghu@yahoo.com gemstone.beauty2009@yahoo.com housweety.services@yahoo.com
19	亚磊 马 (Ya Lei Ma)	dbs-store7	horizon0706@outlook.com
22	Jingkun Ma	dr.dent1	only20181009@163.com
23	鑫 梁 (Xin Liang)	dreamer-store709	china_dream_709@yahoo.com.cn china_dream_709@163.com
26	Alexander Livshits	easy-2buyy1	marishaalex2307@gmail.com
28	华 周 (Hua Zhou)	ec-sells	76083233@qq.com
29	蓉 叶 (Rong Ye)	ecudiagnose	auto2tech@gmail.com autotech@hotmail.com sales@auto2tech.com order@auto2tech.com
30	Chaolei Ma	edent0810	18003835165@163.com
33	会 田 (Hui Tian)	feidong256	longfei236@sina.com
36	桂方 李 (Gui Fang Li)	gocardiag	info@itcardiag.com 1843265526@qq.com
43	Ilia Shubny	ivscorpil	muramez@mail.ru muramez90@gmail.com ivscorp2017@gmail.com
44	修珑 胡 (Hu Xiulong)	je-aime-perles	beads-online@live.com crafts-home@outlook.com hellogemstone_wei@yahoo.com jewelry-diy@outlook.com robbie.wei@yahoo.com xiaoduo.pan@outlook.com hellogemstone@gmail.com qizanwei@yahoo.com robbie.wei@panduo.com.cn
46	岩岩 蔡 (Yan Yan Tsai)	ledlightcarparts	feiyanled@hotmail.com
47	晓云 钟 (Xiaoyun Zhong)	lind_chen1	susan123abc@163.com

No.	Defendant Name	Defendant eBay ID	PayPal email address
50	Pingyan Li	mingtge	lipybj@hotmail.com
53	Jian Jun Wei	niu junjun98	laoweijia shenvo@outlook.com
54	Jinli Ding	promall	2189647685@qq.com
56	媛媛 张 (Yuanyuan Zhang)	seniors_203	seniors203@outlook.com
57	绍雄 戴 (Shao Xiong)	sincereobd2	daiobd@outlook.com sincereobd2@outlook.com sincereobd@outlook.com
58	佰香 王 (Bai Xiang Wang)	sinosells699	844314000@qq.com info@ecutool.us wbaixiang@yahoo.com
59	Hailan Li	smartgo-gps-wholesale	tingyumanbu317@163.com
60	Jian Le Zhao	strength_simone	1755791556@qq.com
63	Ou Ping Su	ucartool2015	chinacathy@163.com
65	Azhou Chen	vehiclegenius	autoolboxgina@hotmail.com shzwz@126.com
66	明和 黄 (Meiwa Ki)	xiaoxiaowei17	huangminghe12@hotmail.com
69	国臣 张 (Guochen Zhang)	yf_home	yf111aaa@126.com airhomepay@126.com easily_pay@126.com hkpays@126.com yf_home_pay@126.com
70	媛媛 张 (Yuanyuan Zhang)	yfmotor	motorknight2018@outlook.com
71	Zuqiu He	yiou-2017	myangelok@qq.com
72	Yang Zhang	ywssg515	tzlangm@hotmail.com
74	会 邓 (Hui Deng)	zeus_tech	chinamaster02@hotmail.com chinatool93@gmail.com chinatool93@hotmail.com mandydeng49@yeah.net
76	强华 赵 (Qianghua Zhao)	zykerstore	zyker2017@163.com
77	Qing Zhu	hksinc (zhuqingadaf)	hksinczq@outlook.com hksincc@gmail.com
79	离军 王 (Li Jun Wang)	july6292012	july6292012@hotmail.com
81	Qingqing Luo	besttool2019	rr@jebolist.com
83	景 王 (Wang Jing)	wxystore	liuzhigui2014@outlook.com

Plaintiff is entitled to statutory damages pursuant to 15 U.S.C. § 1117 (c)(2) in the amount of \$2,000,000 for each mark infringed, or \$16,000,000 per Subject Defendant, who each infringed at least eight of Audi AG's ("Audi"), VW AG's ("VW"), Bentley Motors' ("Bentley"), and Automobili Lamborghini's ("Lamborghini") (collectively "the VW Brands") federally-

registered trademarks by their sale of the Counterfeit VWGoA Products. However, Plaintiff moves for a total statutory damages award of only \$2,000,000 per Subject Defendant as part of its ongoing efforts to combat trademark infringement and deter other individuals or corporations from infringing Plaintiff's valuable marks.

Plaintiff also moves for entry of a permanent injunction against the Defendants from making, using, selling, or offering for sale any products that infringe Plaintiff's trademarks. Plaintiff also moves for this Court to order PayPal, Inc. to transfer any monies currently restrained in the above Defendants' financial accounts to be released to Plaintiff as partial payment of the above-identified damages.

Date: March 13, 2020

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Daniel E. Yonan (VSB No. 46019)

Nicholas J. Nowak (*pro hac vice*)

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